IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

RICHMOND DIVISION

SEP - 8 2009

CLERK
U.S. BANKRUPTCY COURT

In re:

Chapter 11

CIRCUIT CITY STORES, INC., et al.,

Case No. 08-35653 (KRH)

Debtors.

RESPONSE TO DEBTOR'S THIRTY-FIRST OMNIBUS OBJECTION TO CLAIMS

COMES NOW the claimant, ANGELA ROSS, by and through her undersigned attorney, and hereby files her response to Debtor's Thirty-First Omnibus Objection to Claims and states as follows:

- 1. The claimant, ANGELA ROSS, 111 Moonstone Court, Port Orange, FL 32129. was a business invitee of the Debtor when she fell into a hole in the showroom floor and was injured on its business premises located at 2500 West International Speedway Blvd., Daytona Beach, Florida.
- 2.Her claim is valued at \$25,000.00 based on past and future medical bills and past and future pain and suffering. All medical records and bills have previously been provided to the debtor as an attachment to the original Statement of Claim.
- 3.Considering the clear liability on the part of the Debtor, confirmed by witness Nicole Salyers, the objection should be overruled.
- 4. Upon information and belief, the Debtor has liability insurance and since the claim is for less than that amount, said claim should be allowed to continue.
 - 5. The undersigned attorney has authority to reconcile,

settle or otherwise resolve the objection on the claimant's behalf.

I HEREBY CERTIFY that the original has been provided via

U.S. Mail to Clerk of the Bankruptcy Court, United States

Bankruptcy Court, 701 East Broad Street, Room 4000, Richmond,

Virginia 23219, with a copy to Greg Galardi, Esquire, P.O. Box

636, Wilmington, Delaware 19899; Chris Dickerson, Esquire, 155

North Wacker Drive, Chicago, Illinos 60606 and Douglas Foley,

Esquire, One James Center, 901 E. Cary Street, Richmond, Virginia

23219 this day of September, 2009.

HORROX & GLUGOVER, P.A.
Joseph Michael Horrox, Esquire
Florida Bar No. 0725633
1030 W. Int'l Speedway Blvd.
Suite 270
Daytona Beach, FL 32114
(386) 226-9810 telephone
(386) 226-9815 fax

I hereby declare that the facts alleged above are true and correct to the best of my knowledge.

Angela Ross, Claimant

Dated this day of September, 2009.